

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

EDGAR OMAR HERRERA FARIAS,)

Defendant.)

NO. 4:15-CR-6049-EFS-16

DEFENDANT'S STATEMENT
OF REASONS IN SUPPORT
OF THE MOTION TO
CONTINUE TRIAL

My attorney has advised me of my right under the Speedy Trial Act, 18 U.S.C. § 3161, to go to trial within a seventy-day period. My attorney has also advised me that a continuance of the trial is needed, and we discussed the reasons for a continuance.

A motion to continue the trial has been filed.

My attorney has advised me, and I understand that, if the Court grants the motion to continue that all time between the date the motion to continue was filed and the new date for trial will be excluded from the speedy-trial period under the Speedy Trial Act.

After reviewing the motion and discussing the reasons for the requested continuance with my attorney, I knowingly and voluntarily ask this Court to grant that motion to continue and reset the trial date from its current date of March 23, 2020 to a date not later than August 17, 2020 for the following reasons as found in 18 U.S.C. § 3161: I was appointed new counsel to file a motion to withdraw my guilty plea based on erroneous advice of my prior counsel. The court granted the motion allowing withdrawal of my guilty plea. ECF 1343. My new counsel needs additional time to prepare to defend this case at trial.

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5 I declare under penalty of perjury that the foregoing is true and correct.

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7 Edgar D. #1
Defendant
8 Date: 02/12/2020

9 I have read this form and discussed the contents with my client.

10 Shirley C. Smith
Counsel for Defendant
11 Date: 2/12/20

12 I have translated this form into a language in which the Defendant is conversant. If
13 questions have arisen, I have notified the Defendant's counsel of the questions and have
14 not offered not given advice nor personal opinions.

15 SHARON YEDIDIA
Interpreter (printed name)
16 Sharon Yedidia
Interpreter (signature)
17 Date: 02/12/20